



ALABAMA HAZARDOUS WASTES MANAGEMENT AND MINIMIZATION ACT (AHWMMA)
Compliance Evaluation Inspection (CEI) Report

1) Author of Report

Bailee Dykes
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Compliance and Enforcement Section, Industrial Hazardous Waste Branch
Alabama Department of Environmental Management (ADEM)
1400 Coliseum Boulevard
Montgomery, AL 36110

2) Facility Information

Robbie D. Wood, Inc. (RDW)
1051 Old Warrior River Road
Hueytown (Jefferson County), Alabama 35023

Emelle, Alabama Maintenance Terminal
36964 Alabama Highway 17, Mile Marker 163
Emelle (Sumter County), Alabama 35459
Phone: 205-652-8026
Coordinates: 32°47'14.55"N
88°18'50.19"W

EPA ID Number: ALD067138891
NAICS Code(s): 484121

3) Responsible Official(s)

Mr. John Burke – Shop Supervisor, RDW

4) Inspection Participant(s)

Mr. Guy Coghlan – Technical Manager, Chemical Waste Management (CWM)
Ms. Paula Whiting – EPA Region 4
Mr. Corey Holmes – ADEM
Ms. Bailee Dykes – ADEM
Mr. Austin Pierce – ADEM

5) Date of Inspection

March 12, 2018



6) Applicable Regulations

ADEM Administrative Code Division 335-14, Hazardous Waste Program Regulations

7) Purpose of Inspection

The purpose of the inspection was to determine compliance with all applicable requirements of the Hazardous Waste Program regulations.

8) Facility History & Description

RDW is a family owned and operated truck line that specializes in the transportation of hazardous waste throughout the United States and Canada. The company was organized in 1965, incorporated in Alabama in 1975, and started transporting hazardous waste in 1980. The facility last submitted a *Notification of Regulated Waste Activity* (ADEM Form 8700-12, received by the Department on April 3, 2017) identifying itself as a transporter/transfer facility of hazardous waste, a used oil generator, and an universal waste transporter. The 10-day transfer facility is located on CWM's property; approximately ½ mile from the CWM main entrance. The transfer facility is operated by RDW.

9) Observations

At approximately 1:00 pm, representatives of the Department (Mr. Holmes, Mr. Pierce, and I), Ms. Whiting of EPA Region 4 (hereinafter "we" or "us"), and Mr. Coghlan of CWM arrived at the transfer facility. Mr. Coghlan guided us on a walk-through inspection of the facility, noting the following areas:

Transfer Facility Area

First, Mr. Coghlan escorted us through the transfer facility. The 10-day hazardous waste transfer facility consists of a fenced gravel lot with warning signs posted on the perimeter fence. The transfer facility operates 24 hours, and the area is secured by an automatic gate with a combination lock. In this area, we observed four 20 yard roll-off containers staged in the gravel lot holding hazardous waste. All of the containers were closed, labeled with the words "Hazardous Waste" and marked with accumulation start dates. The oldest container in the lot was marked with a date of "3/10/2018". No areas of concern were noted in the transfer facility lot.

Yard Inventory Building

Last, Mr. Coghlan escorted us to the Yard Inventory Building located along the side of the perimeter fence near the highway. The Yard Inventory Building contained manifests for waste shipments and yard inventory logs. After a review of the inventory logs, no container appeared to exceed the 10-day storage limit for the transfer facility. No areas of concern were noted with the document review.



Summary

This inspection was performed to determine the facility's compliance with all applicable requirements of Division 14 of the ADEM Administrative Code.

Following the walk-through inspection, we conducted a closing conference with Mr. John Burke, shop supervisor for RDW on the morning of March 15, 2018. At the conclusion of the closing conference, we prepared a *Preliminary Inspection Report*, indicating that no areas of concern were noted during the time of the inspection. Mr. Burke reviewed, signed, and accepted the report on behalf of RDW.

10) Signed

Compliance and Enforcement Section
Industrial Hazardous Waste Branch
Land Division

4/11/2018

Date

11) Concurrence

Brent A. Watson, Chief
Compliance and Enforcement Section
Industrial Hazardous Waste Branch
Land Division

4/11/2018

Date